

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA	§	
	§	
V.	§	
	§	
EIMER MEDINA-RUIZ	§	H-07-cr-65
MYRA LORENA ORELLANA-MORALES	§	
JOEL HERNALDO PAREDES-GOMEZ	§	
AURELIO MOSQUERA	§	
AURORA RUIZ	§	
JOHN ALEX MARROQUIN-PATINO	§	

UNOPPOSED MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

Myra Lorena Orellana-Morales, by and through her attorney of record, **Mike DeGeurin**, moves this Court, pursuant to 18 U.S.C. § 3161(h)(8)(B)(I), for a continuance of her pretrial conference date of February 12, 2010 and her trial date of February 22, 2010. In support of this motion defendant presents the following:

I.

Ms. Myra Lorena Orellana-Morales has been indicted in a multiple district and multiple division drug conspiracy. Although the government and defense counsel have been diligent with their efforts to bring about a global resolution to all interrelated cases styled United States vs. Myra Lorena Orellano-Morales, the procedural and logistic issues are manageable but complex. Additional time is

needed. It is believed that a continuance of the present trial setting is in the interest of justice and will eliminate the necessity of multiple trials.

II.

The government and the defendants agree the trial date of February 22, 2010 could result in a miscarriage of justice and that a continuance will serve the best interests of the defendants and the public.

Respectfully submitted,

FOREMAN, DeGEURIN & NUGENT

/s/ *Mike DeGeurin*

Mike DeGeurin
Attorney for Defendant
300 Main Street
Houston, Texas 77002
(713) 655-9000
(713) 655-1812

Federal Bar Number 3558

CERTIFICATE OF CONFERENCE

Defense counsel has conferred with the Assistant United States Attorney James Sturgis and he is unopposed to this motion. Defense Counsel has conferred with counsel for all the co-defendants and they are unopposed to the continuance.

/s/ *Mike DeGeurin*

Mike DeGeurin

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic system upon the Assistant U.S. Attorney, James Sturgis, on this the 29th day of January, 2010.

/s/ Mike DeGeurin

Mike DeGeurin